National Oceanic and Atmospheric Administration
Facility Environmental Inspection Sheet

This document attempts to determine the potential impact of the National Oceanic and Atmospheric Administration on the environment. While the term "the environment" can have very broad implications, it can also be extremely narrow depending on the point of view. One of the prerequisites to completing the form is to determine just what is the facility's "environment" for each area reviewed.

For example, many NOAA offices are located on a small piece of real estate and because they generate less than 1,000 kilograms (2,200 pounds) of hazardous waste per month, they are considered "Small Quantity Generators". This designation allows reduced compliance responsibilities.

If however, a NOAA office is on a University or at an airport or research facility, it may have to comply with the requirements for the "Large Quantity Hazardous Waste Generators" - regardless of how little waste the office actually generates.

Where possible, special notes to aid the user in determining the scope of the requirements have been included in the form. Most of these notes are in the form of Code of Regulation (CFR) references. To review a citation, go to www.epa.gov, click on "Laws and Regulations" and follow the directions.

A. Pesticides		**YES**	**NO**	**Don't Know**
1.	Do you or your staff apply pesticides in or around the site?	9	9	9
a.	Does the State require facility employees to be trained and certified as "pesticide applicators"? (review your State requirements)	9	9	9
b.	If so, have the involved employees received the required Training and State certification?	9	9	9
c.	Are the pesticides applied approved by the EPA for this use? (see 40 CFR 152.175 as well as appropriate State regulations)	9	9	9
d.	Are the pesticides stored properly? (see 40 CFR 165.7 as well as State regulations)	9	9	9
e.	Are the pesticide residues and empty containers disposed according to directions on the label?	9	9	9

		YES	NO	Don't Know
2.	Are you responsible for employing contractors to apply pesticides in or around the facility?	9	9	9
a.	Does the contract contain wording requiring the vendor to comply with all applicable Federal, State or local regulations concerning the application, storage, disposal/removal use of pesticides?	9	9	9
b.	Are the contractor personnel certified by the State as "commercial applicators" to apply the pesticides employed?	9	9	9
B.	**Endangered Species**			
1.	Do any of your operations impact "threatened and endangered" species as defined by the Department of Interior's Fish and Wildlife Service (for land based species) or the Department of Commerce's National Marine Fisheries Service (for marine species)? [**NOTE**: The list of regulated species can be found in 50 CFR 10.13 (Migratory Birds); 50 CFR 17.11 (Wildlife) and 50 CFR 18 (Marine Mammals)]	9	9	9
2.	Are you planning any activities which might effect these threatened or endangered species? (i.e. construction projects, off-site maintenance activities, etc.)	9	9	9
C.	**National Environmental Policy Act (NEPA)**			
1.	Are you planning:			
a.	A construction, modification, or rehabilitation of a building or property?	9	9	9
b.	A change in facility siting or significant redistribution of staff?	9	9	9
c.	A change that will alter the prevailing land use?	9	9	9
2.	If yes, has the NEPA process defined in NAO 216-6 been followed?	9	9	9
D.	**Clean Air Act**			
1.	Have you modified, constructed or added new boilers, generators, or fuel storage tanks for steam generating units with thermal capacity exceeding 10 million BTU/hour?	9	9	9

		YES	NO	Don't Know
a.	If so, was a permit from the State obtained?	9	9	9
2.	Do you plan to do any of the activities listed in question D.1?	9	9	9
a.	If so, is a permit from the State required?	9	9	9
3.	Do you or your staff service or repair CFC - containing equipment or dispose of CFC's?	9	9	9
a.	Have personnel attended EPA-certified training courses?	9	9	9
b.	Has the use of alternatives to CFC's been explored?	9	9	9
4.	Does the facility have an emergency power generator?	9	9	9
a.	Does the State require a permit to operate the generator?	9	9	9
b.	If so, has the appropriate permit been obtained?	9	9	9
5.	Does the facility store over 2,532 gallons (or 10,000 pounds) or more of propane in aggregate total?	9	9	9
6.	Does the facility store over 10,000 pounds of hydrogen gas?	9	9	9
7.	If yes to question D-5 or D-6, have the regulations regarding Preparation of a Risk Management Plan in 40 CFR 68 been reviewed?	9	9	9
E. Clean Water Act				
1.	If your activities result in wastewater discharges, have these discharges been identified, measured and documented?	9	9	9
2.	Are State permits required for any of these discharges?	9	9	9
3.	Does the facility discharge to a local sewage treatment plant?	9	9	9
a.	If so, do you or your staff discharge anything other than sanitary wastewater to this plant?	9	9	9

		YES	NO	Don't Know
4.	If you use a significant amount of water as a cooling agent, is the water discharged in accordance with State regulations?	9	9	9
5.	Does the facility store in excess of 660 gallons of a petroleum product in a single above-ground storage tank or an aggregate of 1,320 gallons in multiple above-ground storage tanks?	9	9	9
	a. If so, has a Spill Prevention Control and Countermeasures (SPCC) Plan been prepared for the facility and signed by a Professional Engineer registered by the State?	9	9	9
	b. Has the SPCC plan been reviewed by a Professional Engineer (P.E.), registered by the State, within the past 3 years?	9	9	9
	c. Has the plan been reviewed by you and your staff to ensure the prescribed procedures are followed and all equipment and structures are functioning?	9	9	9
6.	Is precipitation allowed to contact the fill port area of the fuel storage tanks?	9	9	9
	a. Is the precipitation collected prior to discharge?	9	9	9
	b. Is the precipitation discharged to a storm water system?	9	9	9
	c. Does the facility have a storm water permit for this discharge?	9	9	9
F. Drinking Water				
1.	Does the facility use a well for its drinking water?	9	9	9
2.	If so, has the water been tested as required by state and/or local regulations?	9	9	9
G. Toxic Substances				
1.	Do you have a PCB-containing transformer still in service or currently stored pending disposal in your work area?	9	9	9

		YES	NO	Don't Know
a.	Is it marked with the PCB markings?	9	9	9
b.	If still in service, is it inspected every three months?	9	9	9
c.	Are the inspection records kept for 3 years?	9	9	9
d.	Have the size and location of the transformer(s) been registered with the local Fire Department and the USEPA? (Use EPA form No. 7720-12).	9	9	9
2.	Does the facility have other PCB-containing electrical equipment (i.e. switches, capacitors, fluorescent ballasts, etc) still in service?	9	9	9
a.	Do you know their location?	9	9	9
b.	Are they marked?	9	9	9
3.	Has the facility performed an asbestos survey?	9	9	9
4.	If PCBs are analyzed by a laboratory or part of a research and development project			
a.	Are the PCBs and PCBs in analytical reference samples obtained from EPA authorized sources?	9	9	9
b.	Are all PCB waste stored in accord with 40 CFR 761.64?	9	9	9
5.	Is asbestos present?	9	9	9
a.	If so, is the location recorded?	9	9	9
b.	Has the asbestos-containing material (ACM) been marked?	9	9	9
c.	Is the ACM considered friable?	9	9	9
d.	Have you informed your staff of its presence?	9	9	9

		YES	NO	Don't Know
	e. Have maintenance personnel been briefed on proper maintenance activities where asbestos is present?	9	9	9
6.	Are there plans to remove the asbestos-containing materials?	9	9	9
	a. Does the asbestos abatement plan met the requirements of 40 CFR 763.121?	9	9	9
	b. Does the plan need to be submitted to the EPA Regional Office as required by 40 CFR 763.124?	9	9	9
7.	If you staff will perform the asbestos abatement, have they been trained and certified as required by 40 CFR 763.121?	9	9	9
	a. Have the necessary physicals been provided?	9	9	9
8.	Will the asbestos abatement be done by a contractor?	9	9	9
	a. Does the contract contain wording requiring the Vendor to comply with all Federal, State and local regulation concerning the removal and disposal of asbestos?	9	9	9
9.	Is lead based paint present at the facility?	9	9	9
	a. Are there plans to remove or disturb the lead based paint?	9	9	9
	b. If so, will the work be done by facility personnel?	9	9	9
	c. If so, do the required medial exams of personnel include analysis for lead?	9	9	9
	d. If the remodeling/construction activity will be done by a contractor, does the contract include language requiring compliance with the OSHA and EPA lead pain standards?	9	9	9
10.	Does the facility include living quarters for employees?	9	9	9
	a. If so, has a radon survey been conducted?	9	9	9

		YES	NO	Don't Know
H. Hazardous Waste				
1.	Do you know if the facility is a hazardous waste generator?	9	9	9
2.	Do you know the level of generation?	9	9	9
3.	If the site is a generator of hazardous waste, have you performed a survey of all wastes discarded by you and your staff?	9	9	9
4.	Has the results of your waste survey been reviewed with the Environmental Coordinator to correctly identify which are hazardous wastes?	9	9	9
5.	Do you use "satellite accumulation" areas to collect waste?	9	9	9
	a. Is the aggregate volume of all the wastes stored in the area less than 55-gallons of non-acute or 1-quart of acute hazardous waste?	9	9	9
	b. Is the area under the control of the operator?	9	9	9
	c. Are the containers in good condition?	9	9	9
	d. Are the containers compatible with the waste?	9	9	9
	e. Are the containers kept closed?	9	9	9
	f. Is each container marked with the words "Hazardous Waste"?	9	9	9
	g. Does your facility require other information be applied such as the EPA Identification number ad the DOT hazard class?	9	9	9
	h. Once the 55-gallon or 1-quart limit is met, is the waste moved to an accumulation or permitted storage area within 3 days?	9	9	9
6.	Do you manage a less than 90-day accumulation area?	9	9	9

		YES	NO	Don't Know
a.	Are all containers clearly marked with the date the waste accumulation began?	9	9	9
b.	Are all wastes stored in accordance with Subpart I of 40 CFR 265?	9	9	9
	- are the containers in good condition?	9	9	9
	- are the containers compatible with the waste?	9	9	9
	- are the containers managed to prevent rupture?	9	9	9
	- are the containers kept closed?	9	9	9
	- are the containers inspected weekly?	9	9	9
	- are incompatible wastes kept segregated?	9	9	9
c.	Have all personnel using the accumulation area been trained in accordance with 40 CFR 265.16?	9	9	9
d.	Has annual refresher training been given and documented?	9	9	9
7.	Prior to transportation off-site, are all wastes packaged, marked, and labeled in accordance with US DOT hazardous materials regulations in 49 CFR 172 and 173?	9	9	9
8.	Does each waste container have a "Hazardous Waste" marking which identifies the waste?	9	9	9
9.	Do you know your role in your facility's Hazardous Waste Contingency Plan?	9	9	9
a.	Have you informed those you supervise about their role in this plan?	9	9	9
10.	Have all personnel involved in operating or managing the hazardous waste received initial and refresher training?	9	9	9

		YES	NO	Don't Know
11.	The EPA has designated used batteries (lead acid, nickel-cadmium, carbon-zinc, etc.) pesticides, mercury thermostats and lamps (fluorescent tubes, mercury vapor, etc.) as **universal wastes** if recycled.	9	9	9
	a. Does the facility recycle all of these wastes?	9	9	9
	b. If not, are these wastes managed as hazardous wastes?	9	9	9
12.	If the facility uses a contractor to transport hazardous wastes to a permitted disposal facility, does the contract contain wording requiring the contractor to comply with all applicable Federal, State and local laws?	9	9	9
I. Past Contamination				
1.	To your knowledge, has any part of the property been used to dispose of unwanted materials in the past?	9	9	9
2.	If yes, have you informed the Environmental Coordinator?	9	9	9
J. Underground Tanks				
1.	Does the facility have any underground storage tanks?	9	9	9
2.	Are they in use?	9	9	9
3.	Has the state been notified of their existence?	9	9	9
4.	If in use, does the design, construction, installation, and notification comply with the standards in 40 CFR 280?	9	9	9
5.	If not in use, have the tanks been closed in accordance with 40 CFR 280.70?	9	9	9
K. Emergency Planning				
1.	Does the facility have an emergency power back-up system which uses lead-acid or gel-cell batteries with 170 gallons or more of electrolyte?	9	9	9

		YES	NO	Don't Know
2.	Does the facility use of fuel storage tank(s) with a capacity of 1,320 gallons (or 10,000 pounds) or more of diesel fuel, heating oil, or gasoline?	9	9	9
3.	Have you determined if you or your staff use or store any of the commodities listed in 40 CFR 355 (extremely hazardous substances)?	9	9	9
	a. Have you informed the site environmental contact?	9	9	9
4.	Has the facility designated a representative to the Local emergency Planning Committee (LEPC) to participate in the local response plan as required by 40 CR 355.30 (c)?	9	9	9
5.	Do you report all releases of hazardous substances (as listed in 40 CFR 302.4) and extremely hazardous substances (as listed in 40 CFR 355) over the reportable quantity (RQ) to the facility Environmental Coordinator who then can report the release to the National Response Center?	9	9	9
L.	**Hazardous Material Transportation**			
1.	Does the facility transport DOT hazardous materials (as found in 49 CFR 172.101) off-site?	9	9	9
2.	If hazardous materials are transported from the facility, is it:			
	• done by government employees?	9	9	9
	• done in a government vehicle?	9	9	9
	• undertaken for a governmental purpose?	9	9	9
3.	If no, are the DOT regulations for packaging, labeling, marking and preparation of shipping papers in 49 CFR 172-8 carefully followed?	9	9	9
4.	For the shipment of hazardous wastes to a permitted disposal facility, does the contractor complete the manifest?	9	9	9
	a. If yes, have the contractor assignments of the EPA identification numbers and treatment standards been carefully reviewed to assure accuracy?	9	9	9

		YES	NO	Don't Know
M. Cultural/Historic Resources				
1.	Does the facility have any buildings that are at least 45 years old?	9	9	9
2.	Does the facility have any displays of historic memorabilia?	9	9	9
3.	Have artifacts or burial sites been found on the site?	9	9	9
4.	If yes to questions M-1, M-2 or M-3, has the Regional Environmental Coordinator been contacted?	9	9	9
N. Executive Order 12856 and 13101				
1.	Does the facility have written policies/procedures describing necessary actions to prevent pollution while performing its activities?	9	9	9
2.	Have you investigated the use of "environmentally preferable" materials for currently used materials?	9	9	9
3.	Do you ensure in the acquisition of all materials used on-site, the preference for procuring items which are "environmentally preferable"?	9	9	9
	a. Does all copy paper have a minimum 30% recycled paper content?	9	9	9
4.	Have service contracts been reviewed to ensure that the services provided are accomplished in such a way to lessen the impact on the environment?	9	9	9
5.	Have you investigated alternatives to disposal for the management of the wastes streams generated by your operation?	9	9	9
6.	Have you become informed of the goals, policies and procedures to implement pollution prevention in the workplace?	9	9	9

Explanation of the NOAA Environmental Inspection Sheet

A. Pesticides

Questions 1a through 1e: The application of pesticides is highly restricted but the requirements vary widely. Depending on your state's requirements, employees may need to be trained and certified by the state to legally be able to use a can of RAID to control ants in the facility.

Questions 2a and 2b: If outside contractors are employed, always ensure the contract language requires that all appropriate regulations are followed.

B. Endangered Species

Fortunately, determining the presence of threatened and endangered (T$E) species is usually a one-time effort. Once you have determined there are no T&E species in or around the site, this situation rarely changes. If T&E are present, however, this fact will have to be considered in all future activity planning.

C. NEPA

NAO 216.6 defines the process to be used to determine the environmental impact of a planned change to the facility. The process must be integrated into the planning process early enough to allow mitigating factors to be developed, investigated and implemented.

D. Clean Air Act

Questions 1 through 4: Most states are authorized to enforce the provisions of the Clean Air Act and thus it is important to review the state requirements for permits for emission sources. In general, air permits are usually required for:

A. boilers over 10,000 BTUs
B. fuel storage tanks for these boilers
C. operation of the diesel generator.

Questions 5 through 7: In addition, if a facility has over 10,000 pounds of propane or hydrogen, a Risk Management Plan may be required under 40 CFR 68. Not only do these rules require evaluation of the risk presented by the facility, they require development of formal programs to prevent and respond to accidents.

E. Clean Water Act

Questions 1 through 4: Like the Clean Air Act, most states are authorized to manage the Clean Water rules within the state. Typically, the discharge of contaminated water (remember that even heat is considered a contaminant) requires a state discharge permit.

Question 5: The storage of a significant amount of fuel activates the requirement for a SPCC Plan which describes the facility's procedures to both prevent spills from occurring and mitigate the effects should fuel be released. These plans must be certified by a state registered Professional Engineer (P.E.). The SPCC Plan must be reviewed, updated and re-certified every 4 years.

Question 6: If contaminated water can enter a storm water system, a permit may be required. Check with your state.

F. Drinking Water If a facility uses a municipal water system, the municipality is responsible for the water quality. If a private well is used however, the facility becomes responsible to ensure the drinking water meets established state regulations for purity.

G. Toxic Substances The Toxic Substances Control Act regulations regulate use and disposal of PCBs, asbestos, lead-based paint and radon.

Questions 1 & 2: If the facility still has a PCB transformer in use, it must be inspected at least every 3 months (40 CFR 761.30 (ix) and registered with the EPA in accord with 40 CFR 761.30(a)(vi)(A).

Questions 3 through 7: While the EPA and the state regulates the disposal of asbestos (triple bagging of wetted material), OSHA regulates the use, maintenance and removal of this material in the workplace (see 29 CFR 19190.1001).

Question 8: The removal and disposal of lead-based paint (LBP) is regulated by both the EPA and OSHA. The EPA in 40 CFR 745 defines the notification for residents and the training and certification required for workers removing LBP in housing. In 29 CFR 1926.62, OSHA defines the required worker protection programs employers must provide for employees removing LBP.

H. Hazardous Waste

Questions 1 through 4: The determination of the level of generation is critical to understanding the regulatory requirements in 40 CFR 262. In general, the lower the amount of hazardous waste generated, the less stringent the requirements.

Questions 5 & 6: If hazardous wastes are stored in either a "Satellite Accumulation" or "90-day Accumulation" area, special requirements regarding the condition of the containers and the area must be met.

Questions 7 & 8: Prior to shipping wastes off-site, both DOT and EPA rules must be followed.

Questions 9 & 10: All sites must have an effective contingency plan and training program.

Question 11: Universal Wastes are defined in 40 CFR 261.9 as all batteries except for lead-acid batteries (which are regulated under 40 CFR 266 Subpart G), pesticides, mercury-containing thermostats and "lamps."

Examples of lamps include fluorescent tubes; high intensity discharge bulbs; neon, mercury vapor, high-pressure sodium and metal halide lamps.

Universal wastes cannot be discarded in the garbage. They must be recycled or managed as hazardous wastes.

I. Past Contamination

If materials have been discharged on-site in the past, contamination of the groundwater and/or soil may have occurred. Remedial work to remove and/or treat the contamination may be required.

J. Underground Tanks

If an underground storage tank (UST) was brought into use on or after May 8, 1986, the facility was required to register its existence with the EPA or state within 30 days of coming into use. By December 22, 1998, all USTs were required to meet the design standards of 40 CFR 280.40 for the release detection system. To remove a UST from service (i.e. "Perform closure"), the EPA rules in 40 CFR 280.70 must be followed to ensure minimal residual contamination is left on the site.

K. Emergency Planning

Questions 1 and 2: The storage of over 1,000 pounds (170 gallons) of sulfuric acid or 10,000 pounds (1,320 gallons) of diesel fuel, heating oil or gasoline triggers a requirement in 40 CFR 355.30 (b) to file a Tier I or Tier II form with the State Emergency Response Commission (SERC) and the Local Emergency Planning Committee (LEPC). The local fire department must also receive a notification.

Also as a result of this activity, the facility must designate a representative to the LEPC.

Questions 4 and 5: If the facility has a release of any material listed in 40 CFR 302.4 or 40 CFR 355 in excess of the reportable quantity IRQ), the National Response Center (1-800-424-8802) must be notified.

L. Hazardous Materials Transportation

Questions 1 through 3: Under the Hazardous Materials Transportation Uniform Safety Act of 1990 (HMTUSA), if a hazardous material is transported

A. by a government employee
B. in a government vehicle
C. for a governmental purpose,

the DOT hazardous materials rules in 49 CFR 171-178 do not need to be followed.

If any one of these conditions is not met, however, the material is fully regulated and all the DOT rules apply.

Question 4: This exemption does not apply to hazardous wastes on their way to a hazardous waste facility because a contractor is normally employed. Even if the contractor completes the paperwork, the facility is still legally responsible for complying with DOT rules. As a result, careful review of the contractor's work is always prudent.

M. Cultural and Historic Resources

Because of the complexity of issues with cultural and historic resources, it is recommended that the NOAA Regional Environmental Coordinator (RECO) be contacted for guidance.

N. Executive Orders 12856 and 13101

In an effort to promote a clean environment and sustainable use of our resources, the President has set the Federal Government as an example for the rest of the nation. Executive Orders 12856 and 13101 facilitate pollution prevention at federal facilities by requiring an internal look at the existing acquisition, use and disposal of hazardous chemicals in the workplace.